

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

**FILED**

MAR - 2 2005

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

CRAIG RICHEY,

Defendant.

)  
)  
)  
)  
) No.  
)  
)  
)

4 : 05 CR 00122 JCH

**INDICTMENT**

**COUNT ONE**

The Grand Jury charges that:

On or about December 16, 2004, in the County of St. Louis within the Eastern District of Missouri, the defendant,

**CRAIG RICHEY,**

did knowingly and intentionally possess with the specific intent to distribute approximately 129.37 grams net weight of marijuana, a Schedule I controlled substance drug.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D).

**COUNT TWO**

The Grand Jury further charges that:

On or about December 16, 2004, in the County of St. Louis within the Eastern District of Missouri, the defendant,

**CRAIG RICHEY,**

did knowingly and intentionally possess with the specific intent to distribute approximately

245.55 grams net weight of cocaine base (commonly known as crack cocaine), a Schedule II narcotic controlled substance drug.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(iii).

**COUNT THREE**

**CRIMINAL FORFEITURE**

Upon conviction of one or more of the controlled substance offenses alleged in Counts One and Two of this Indictment, defendant Craig Richey shall forfeit to the United States pursuant to 21 U.S.C. § 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of said violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, including but not limited to the following:

1. CURRENCY

Approximately \$2,939.00 in United States Currency.

If any of the forfeitable property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of said violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other

property of said defendant up to the value of the forfeitable property described above.

In violation of Title 21, United States Code, Section 853.

A TRUE BILL.

---

FOREPERSON

JAMES G. MARTIN  
United States Attorney

---

MICHAEL W. REAP, #9156  
Assistant United States Attorney